



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

NOV 5 2017

Stacia A. Christman, Senior Counsel
Eastman Chemical Resins, Inc.
State Route 837
P.O. Box 567
West Elizabeth, Pa 15088-0567

Re: Extension for Compliance with May 26, 2017 CWA § 308 Information Requirement
Eastman Chemical Resins, Inc. – Jefferson Hills Facility
West Elizabeth, PA – Allegheny County
NPDES Permit No. PA 0000507

Dear Ms. Christman:

This letter is in response to the phone call discussion you had with EPA NPDES Inspector Andrew Seligman on November 21, 2017 regarding Eastman Chemical Resins, Inc. ("Eastman")'s request for an extension to the CWA Section 308 (308) information request dated May 25, 2017.

The following correspondence related to this response has occurred between EPA and Eastman to date. On May 25, 2017, EPA sent a 308 request for information to Mr. Eugene Ingram, Plant Manager at Eastman. Eastman responded on June 9, 2017 requesting additional time to respond to all requests. Upon receipt of this request, Andrew Seligman called Eastman to discuss responses and grant Eastman additional time to respond to the request. On August 4, 2017, Eastman provided a second response to the 308 request. EPA completed review of Eastman's second response and spoke with you via conference call on November 21, 2017, during which Eastman requested additional time to complete a thorough response to missing items. On November 22, 2017 you emailed EPA requesting an additional 90 days to complete the response.

After reviewing portions of the 308 responses which are still incomplete, EPA will grant Eastman a 30-calendar day extension, until January 3, 2018, conditioned on a phased response of the remaining requested information. The following timeline provides a schedule to complete your 308 responses. Each item is detailed as it was in EPA's original 308 request. For EPA to complete its review, it is essential that we receive all documentation from you according to this timeline.

Submission 1 – Due December 13, 2017

Item 18: All existing process flow diagrams (not the piping and instrumentation diagrams) and a site plan for the Facility. If existing process flow diagrams do not represent current configuration or rates, state so and provide current configurations and rates where appropriate. On the diagrams and site plan



using a key for clarity purposes, specifically identify each process unit at the Facility that uses or discharges process water and the corresponding water pollutant control equipment and discharge point. Include each process unit on contiguous or adjacent properties under the control of, or owned or operated by, Respondent. Provide a separate list of effluent discharge points with the descriptive name and ID number.

As discussed during the November 21, 2017 conference call, this submission is considered incomplete because no process diagrams were submitted. Provide a description of both the stormwater and process water operations. Please also provide scalable maps of Facility Figures 3, 4, 5, and 6 from the SPCC plan that are readable, and either an excel document or scalable chart of the Facility outfalls including GPS locations so that both can be read in detail.

Item 19: A detailed narrative description of the current processes at the Facility from introduction of raw material sequentially through to disposition of products, describing each process waste water discharge point in relation to the process. Refer to each of the relevant process flow diagrams and site plans wherever possible. Provide the description using the same conventions used by the Facility for division of the Facility into process units and vessels. In the narrative, describe the function of each vessel in the process unit.

Nothing was submitted in response to the original request for Item 19. In addition to documentation listed above, as discussed on November 21, 2017, please submit:

- 2016 and 2017 routine 72-hour inspections as denoted in section 3.3.1 of the SPCC plan;
- 2016 and 2017 Dike Surface Water Transfer Log as denoted in section 3.3.1 of the SPCC plan;
- 2016 and 2017 records of preventative maintenance as denoted in section 3.4 of the SPCC plan;
- 2016 and 2017 records of “weekly housekeeping” inspections that prevent pollutant contact with stormwater runoff (only one week was provided in Attachment 30-1).

Submission 2 – Due December 20, 2017

Item 20: An identification and description in detail for each water pollution control device currently installed or each water pollution reduction practice currently implemented at the Facility and provide the date of installation or implementation. Describe in detail how each water pollution control device or practice limits water pollution from each source, and how effectively (in terms of removal efficiency, capture efficiency, etc.) each water pollutant discharge is limited by the corresponding equipment or practice. Describe in detail the method used to determine the removal efficiency and capture efficiency of each device.

This response is considered incomplete as references to other storm water controls were used as responses. Please directly identify and describe pollution control devices as specified above, with specific explanation of the device, purpose, and what pollutants a device is removing from the system.

Item 21: A copy of each feasibility or engineering study conducted to determine present and future production potential for the Facility as a whole and for individual process units or pieces of equipment, including both existing equipment and new construction.

Nothing was submitted in response to the original request for Item 21.

Item 22: In an excel worksheet, actual production in average tons/month for each product for each month of each year.


Nothing was submitted in response to the original request for Item 22. Include 2016 and 2017 product amounts produced, stored, handled, transferred, manufactured, unloaded, and transported to the extent available.

Submission 3 – Due January 3, 2018

Item 26-1: Full and complete copies of all correspondence (including but not limited to emails, meeting notes, hard copy documents) with the Pennsylvania Department of the Environment regarding any formal or informal enforcement actions including but not limited to Notices of Violation, Consent Orders, and Penalties.

All information requested can be sent electronically to Andrew Seligman, NPDES Enforcement Branch, at seligman.andrew@epa.gov.

Date: 12/4/17



David B. McGuigan, Ph.D.
Associate Director
Office of NPDES Permits and Enforcement
Water Protection Division

